

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SMART LOCAL 265 WELFARE FUND, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	20 CV 04435
v.)	
)	Hon. Martha M. Pacold
MAJOR HEATING & COOLING, INC.,)	
an Illinois corporation,)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING
ANSWER OR OTHER PLEADING TO PLAINTIFFS’ COMPLAINT**

NOW COMES the Defendant, Major Heating & Cooling, Inc., and for its Unopposed Motion To Extend the Deadline for it To Answer or otherwise plead to Plaintiffs’ Complaint from June 24, 2024 to July 8, 2024, states as follows:

- 1) Defendant’s Answer or other pleading in response to Plaintiffs’ Complaint is due June 24, 2024.
- 2) The undersigned’s investigation leads the undersigned to believe that Defendant has a meritorious defense to the Complaint that could be resolved by preparing and filing a Motion To Dismiss. On June 20, 2024, the undersigned emailed one of Plaintiffs’ attorneys and advised her of the undersigned’s belief and included documentation in support thereof.
- 3) In order to avoid the time and expense of preparing and filing a Motion To Dismiss and to save this Court’s resources, the undersigned would like time to attempt to resolve this lawsuit before engaging in motion practice.
- 4) One of Plaintiffs’ attorneys, Ms. Catherine M. Chapman, indicated that Plaintiffs do not oppose this Motion.
- 5) This Motion is not filed for the purpose of delay but as a direct result of the circumstances described above.

WHEREFORE, Defendant respectfully requests that this Honorable Court Extend the Deadline for Defendant To Answer Or Otherwise Plead To Plaintiffs' Complaint through July 8, 2024.

MAJOR HEATING & COOLING, INC.

Respectfully Submitted,

By: /s/ Joseph P. Berglund
Its Attorney

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